

Message

From: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]
Sent: 10/14/2016 6:38:54 PM
To: Keller, Lynn [Keller.Lynn@epa.gov]
Subject: RE: VI and Area 40

Thanks for reminding me about the meeting this afternoon. Might have missed it.

From: Keller, Lynn [mailto:Keller.Lynn@epa.gov]
Sent: Friday, October 14, 2016 11:10 AM
To: MacDonald, Alex@Waterboards
Subject: RE: VI and Area 40

I hear you, Alex. I've forwarded your comments on to Dan Stralka; he'll take the first 15 or so minutes of the call today to talk VI. We're considering all of the points and concerns you and Chris have raised on this. Thanks, and have a nice weekend also,
Lynn

Lynn M. Keller, EI, PMP
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From: MacDonald, Alex@Waterboards [mailto:Alex.MacDonald@waterboards.ca.gov]
Sent: Friday, October 14, 2016 9:33 AM
To: Keller, Lynn <Keller.Lynn@epa.gov>
Subject: RE: VI and Area 40

One needs only look at the remedies and proposed land uses and see that the protections will be placed appropriately, regardless of the extent or risk is actually somewhat greater than initially calculated. Everywhere where there is groundwater contamination by VOCs or a soil vapor source, the land use is either open space or fields. Any small buildings placed on those areas will be provided with vapor mitigation measures. The residential area to the north will have vapor mitigation even though it is likely that none is needed.

I would not expect you to go against your VI experts. However, as I stated above the anticipated site use of Area 40 and adjacent lands, coupled with the proposed remedies, provides appropriate protection. I took a look at the Area 40 data and used the 100 µg/m³ TCE value. The result does not change the remedy for the volatiles. For one, the groundwater MCL + 100-foot buffer encompasses all of the northern and all but the lower 1/3 of the southern area 100 µg/m³ values. And that land above the groundwater area has only non-residential uses (park, open space, recreational) and any structures associated with the park would have vapor mitigation requirements. The lowest 1/3 of the southern area would only require an enlargement of the portion with restrictions to the west and east. So it should be a fairly quick evaluation by your VI expert.

Thanks for getting back to me and have a great weekend.

Alex

From: Keller, Lynn [mailto:Keller.Lynn@epa.gov]
Sent: Thursday, October 13, 2016 4:17 PM
To: MacDonald, Alex@Waterboards
Subject: RE: VI and Area 40

Hi, Alex.

I understand your frustration with the process and unknowns; this isn't ideal for anyone. However, I'm no VI expert and my in-house VI expert just needs more time to evaluate the assumptions made and examine contamination levels. I am not going to go against the advice of experts, and I've been advised to hold off on finalizing the HHERA and Draft FS for Area 40 until we have more information. Miscalculations or incorrect assumptions that might lead to exposure are a much more severe consequence than delays, so I want to err on the side of caution and ensure we proceed in a way that will be protective—especially given the anticipated future site use for Area 40 and adjacent lands.

Thanks,

Lynn

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From: MacDonald, Alex@Waterboards [mailto:Alex.MacDonald@waterboards.ca.gov]

Sent: Thursday, October 13, 2016 1:25 PM

To: Keller, Lynn <Keller.Lynn@epa.gov>

Subject: VI and Area 40

Lynn – I am in concurrence with Aerojet on this one. The vapor intrusion issue was evaluated done using the latest risk values. The field work was done in accordance with DTSC guidance and the SOPs. I went out a for a couple of days and watched them collected the samples. I don't think holding up the process for the vapor issue is warranted. The other concerns on getting the rad review done should be the stressor and hopefully that can be resolved soon. I just don't want to have the Agencies be the ones to be blamed for insufficient progress being made and the fallout from it.

Oh, and have a great day.

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